

EXHIBIT B

BENDIN SUMRALL & LADNER, LLC

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December 11, 2023

VIA ELECTRONIC MAIL

John R. Jacobson
Counsel for Guidepost Solutions, LLC.
1906 West End Ave
Nashville, Tennessee 37203
jjacobson@rjfirms.com

RE: SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION;
 ROY BLANKENSHIP

Dear Mr. Jacobson,

I represent Roy Blankenship and am in receipt of your November 21, 2023, subpoena duces tecum to him. This letter is a good faith attempt to resolve disputes regarding our duty of compliance with the subpoena, pursuant to the Local Rules of the United States District Court Middle District of Tennessee LR37.01 in advance of filing any motion.

As you may know, at the time of all communications relevant to the documents requested and the anticipated subject of his deposition, Mr. Blankenship was an ordained minister providing counseling services pursuant to O.C.G.A. § 43-10A-7. Understanding that Tennessee federal courts apply the privilege laws of the state with the most significant relationship to the communication, applicable privileges under Georgia law including the clergy-penitent privilege that Mr. Blankenship knew and relied upon throughout his provision of ministerial and counseling services, will apply in this case.

Under GA Code § 24-5-502, Mr. Blankenship is not competent to, nor may he be compelled to, testify to any communications made to him by any person “professing religious faith, seeking spiritual comfort, or seeking counseling.” GA § Code 24-5-501. Furthermore, Mr. Blankenship is not in possession of any non-privileged documents responsive to your document requests or aware of any non-privileged information to which he is competent or may be compelled to testify.

BENDIN SUMRALL & LADNER, LLC

Roy Blankenship Subpoena
December 11, 2023
Page 2

We would appreciate the opportunity to discuss this matter, understanding that the sooner we discuss, the sooner we will be able to come to a mutual agreement. If we are unable to reach such an agreement, it is Mr. Blankenship's intent to fully assert all applicable privileges utilizing the available and appropriate means, including but not limited to filing a motion to quash or limit the subpoena. With hopes that we will be able to discuss this soon, would you be agreeable to an extension to respond to the subpoena and for the deposition date of some time in January?

Yours very truly,

BENDIN SUMRALL & LADNER, LLC



David V. Hayes, Esq.

DVH/ple